



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

March 11, 2002

Reply To
Attn Of:113

Ms. Kathleen Hain, Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Re: EPA Review of the *Remedial Design/Remedial Action Work Plan for Waste Area Group 4, CFA-08 Sewage Plant Drainfield, OU 4-13 (Draft Final)*

Dear Ms. Hain,

EPA received the above-referenced document on February 22, 2002. EPA has reviewed the draft final work plan and has generated a few remaining comments. The most important issue that requires clarification is the schedule for monitoring and inspections and associated reporting.

Please contact me at (206) 553-0040 if there are any questions concerning these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Ivy", is written over the typed name and title.

Kathy Ivy
Remedial Project Manager

Enclosure

cc: Carol Hathaway, DOE-ID
Clyde Cody, IDEQ

**EPA MARCH 2002 COMMENTS ON THE FEBRUARY 2002
REMEDIAL DESIGN/REMEDIAL ACTION WORK PLAN FOR WASTE AREA GROUP 4,
CFA-08 SEWAGE PLANT DRAINFIELD, OU4-13 (DRAFT FINAL)**

Specific Comments

- 1. Page 1-1, Section 1.0, paragraph 5, last sentence:** Groundwater monitoring would be conducted under the OU 4-12 RD/RA Work Plan, Post-ROD Monitoring Work Plan, but other long-term environmental monitoring such as the periodic radiation survey of the CFA-08 cover would be conducted under the OU 4-13 RD/RA Work Plan. This should be clarified.
- 2. Page 5-2, Section 5.3.3, paragraph 3, last sentence:** It states here that, if the telephone poles are radiologically contaminated, they will be dispositioned at the RWMC. In the Waste Management Plan, Section 4.4, it states that the telephone poles may be disposed of at an off-INEEL TSDF. If an off-INEEL TSDF is an alternative disposal location, this should be listed along with the RWMC in Section 5.3.3.
- 3. Page 5-11, Section 5.16, paragraph 3, third sentence:** If the 25-year duration will be included here, an explanation of its basis as a cost estimate should be added as in the Operation and Maintenance Plan, Section 3.3.5.
- 4. Page 6-1, Section 6.0, last sentence:** If the year 2095 will be included here, an explanation should be provided to differentiate between this date and the design life lasting through the year 2187.
- 5. Attachment 2, Operation and Maintenance Plan, Page 10, Section 3.1:** The institutional control period of 100 years should be described in terms of the timeframe ending in 2095. An explanation should be provided to differentiate between this date and the design life lasting through the year 2187.
- 6. Attachment 2, Operation and Maintenance Plan, Page 16, Section 5.0:** This section should include a schedule with the month and year that monitoring and inspections will occur and associated reports will be submitted. This should help avoid any confusion concerning appropriate timing for data collection and reporting.

Editorial Comments

- 1. Attachment 2, Operation and Maintenance Plan, Page 10, Section 3.3, fourth sentence:** This sentence should be deleted because it repeats information from the previous sentence.